

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

BARRY HOBSON,

*Plaintiff,*

v.

Transit Employees Health & Welfare  
Fund, LLC, *et al.*

*Defendant.*

USC-CASE-FILED-03-17-2025

**Case No: 8:25-cv-00146**

**DECLARATION OF BRANDON GODWIN**

I, **Brandon Godwin**, do solemnly swear under the penalties of perjury and on personal knowledge the the foregoing is true and correct:

1. I am an adult male over eighteen (18) years of age and currently reside in Suitland, Maryland.
2. I was employed with WMATA for 9 years.
3. I was elected Shop Steward and Executive Board Member at ATU Local 689 in December 2018.
4. I served as Shop Steward and Executive Board Member until December 31, 2022.
5. I met Barry Hobson in 2017 when he began working for our union.
6. Barry Hobson never shared with me that he was HIV-positive while working at Local 689.
7. I learned that Barry Hobson was HIV-positive from Transit Employees' Health and Welfare Trustee, Raymond Jackson on June 24, 2022.
8. Barry Hobson hired me to serve a lawsuit to Trustee Jackson in an unrelated matter.



9. Upon service to Trustee Jackson with the lawsuit, upset, he stated to me in a very curt manner “my people in Health and Welfare told me he was HIV-positive I bet you didn’t know that? I been looking out for you, but you are carrying his water now I see, better go get yourself checked”.

10. I understood this me to mean that Trustee Jackson believed that since I was an openly gay man that perhaps me and Barry were engaged in some sort of sexual activity, and I needed to get checked to ensure I didn’t have HIV as well.

11. Having heard Trustee Jackson say how “petty” he was on several occasions; I didn’t take seriously his comment until I learned later that an anonymous email had gone to the Executive Board alleging Barry was HIV-positive on June 30, 2023.

12. I invited Barry to lunch on December 12, 2023 and advised of the exchange I had with Trustee Jackson on June 24, 2022

**I, Brandon Godwin, being duly sworn under oath according to law, declares that the matters stated herein are true and correct to the best of my information, knowledge, and belief.**

  
Brandon Godwin